

Relief Defendant.

[illegible]

) FILED UNDER SEAL
) JURY TRIAL DEMANDED

3. I have worked in the Enforcement Division of the United States Securities and Exchange Commission ("SEC") for 25 years. I currently serve as the Associate Regional Director for Enforcement in the SEC's Fort Worth Regional Office. Presently, I am responsible for supervising the office's enforcement activities, including the investigation of suspected securities-law violations and the litigation of SEC enforcement actions in the federal courts.

4. Since 1998 the Fort Worth Office has sought and obtained emergency and/or *ex parte* relief for the protection of defrauded investors in more than 111 cases. **Exhibit A**, attached, lists those cases.

5. In several of those cases, including ones in which an asset freeze was granted *ex parte*, one or more defendants or relief defendants violated the asset freeze.

6. Based on those experiences and the information I have been provided about the Defendants named herein, including the specific facts set forth in the accompanying Brief in Support of Plaintiff's Motion for Preliminary Injunction, *Ex Parte* Temporary Restraining Order, Asset Freeze, Appointment of Receiver, and Other Ancillary Relief ("Brief"), I believe that irreparable injury and loss is likely to occur if the Court requires notice and a hearing.

7. In this case, the SEC has made no effort to give notice to Defendants Mauricio Chavez, Giorgio Benvenuto, and CryptoFX, LLC (collectively, "Defendants") and CBT Group, LLC, ("Relief Defendant"). Doing so would give Defendants and Relief Defendant an opportunity—before the Court enters the temporary restraining order, the asset freeze, and other emergency relief the SEC is seeking—to dissipate, hide, encumber, or place outside the Court's jurisdiction assets they obtained in the fraudulent scheme described in the SEC's Complaint and further described in the Brief filed herewith.

SIGNED this 15th day of September, 2022 at Fort Worth, Texas.



Eric Werner

EXHIBIT A
CERTIFICATION UNDER FED.R.CIV.P. 65(b)

- (1) *SEC v. Boron Capital, LLC, et al.*, 5:22-cv-114-C, (ND Tex.2022)(Cummings, S.)(granting TRO, asset freeze, preservation of documents, expedited discovery, sworn accountings, alternate service, and order appointing receiver);
- (2) *SEC v. Perez, et al.*, 7:21-cv-00238-DC-RCG, (W.D. Tex. 2021)(Counts, D.)(granting TRO, asset freeze, preservation of documents, sworn accountings, requiring defendants to surrender passports, and expedited discovery);
- (3) *SEC v. Akazoo S.A.*, 1:20-cv-08101-AKH, (S.D. NY 2020)(Hellerstein, A.)(granting stipulated order freezing certain assets, providing an accounting and repatriation of assets);
- (4) *SEC v. Meta 1 Coint Trust, et al.*, No. 1:20-cv-00273-RP (W.D. Tex. 2020)(Pittman, R.)(granting TRO, asset freeze, and order requiring accounting, document preservation, and expedited discovery);
- (5) *SEC v. One or More Unknown Traders in the Securities of Anadarko Petroleum Corp.*, 19-cv-03785-GHW (S.D.N.Y. 2019)(Woods, G.)(granting TRO, asset freeze, and order requiring preservation of documents, alternate service, and expedited discovery);
- (6) *SEC v. Kent R.R. Whitney, et al.*, 8:19-cv-499 (C.D. Cal. 2019)(Selna, J.)(granting TRO, asset freeze, order prohibiting destruction of documents, and order granting expedited discovery, passport surrender, accounting, and appointment of receiver);
- (7) *SEC v. Carter, et al.*, No. 4:19-cv-100-ALM-KPJ (E.D. Tex. 2019)(Jordan, S.)(granting TRO, asset freeze, and order requiring accounting and preservation of documents);
- (8) *SEC v. Gallagher, et al.*, No. 3:19-cv-00575-G (N.D. Tex. 2019)(Boyle, J.)(granting TRO, asset freeze, appointment of receiver, accounting, document preservation, expedited discovery, and alternative service);
- (9) *SEC v. AriseBank, et al.*, No.18-cv-0186-M (N.D. Tex. 2018)(Lynn, B.G.)(granting TRO, asset freeze, passport surrender);
- (10) *SEC v. Faulkner, et al.*, No. 3:17-cv-2405-B (N.D. Tex. 2017)(Boyle, J.)(granting freeze order, temporary restraining order, document preservation, interim accounting, alternative service and expedited discovery);
- (11) *SEC v. Faulkner, et al.*, No. 3:16-cv-1735-D (N.D. Tex. 2017)(Fitzwater, S.)(granting freeze order, temporary restraining order, appointment of receiver, document preservation and expedited discovery);
- (12) *SEC v. Thurman P. Bryant, III, et al.*, No. 4:17-cv-336-ALM (E.D. Tex. 2017)(Mazzant, A.)(granting freeze order as to defendants, temporary restraining order, preliminary injunction, appointment of receiver, document preservation order, order making accounting);
- (13) *SEC v. 4D Circle, LLC, et al.*, No. 4:17-cv-321-Y(N.D. Tex. 2017)(Means, J.)(granting preliminary injunction by consent and order appointing receiver);
- (14) *SEC v. Patrick O. Howard, et al.*, No. 3:17-cv-420-L (N.D. Tex. 2017)(Lindsay, S.)(granting freeze order, temporary restraining order, preliminary injunction, preservation of documents, accounting, expedited discovery, and order appointing receiver);

- (15) *SEC v. Ash Narayan, et al.*, No. 3:16-cv-1417-M (N.D. Tex. 2016)(Lynn, B.)(granting freeze order, temporary restraining order, preservation of documents, expedited discovery, and other emergency relief);
- (16) *SEC v. Crumbley, Jr., et al.*, No. 3:16-cv-0172-L (N.D. Tex. 2016)(Lindsey, s)(granting freeze order, document preservation, interim accounting, expedited discovery, alternate service and order appointing receiver);
- (17) *SEC v. Ascenergy LLC, et al.*, No. 2:15-cv-01974-GMN-PAL (NV 2015)(Navarro, G.)(granting freeze order, interim accounting, and preservation of documents);
- (18) *SEC v. Sethi Petroleum, LLC, et al.*, No. 4:15-cv-338-ALM (E.D. Tex. 2015)(Mazzant, A.)(granting freeze order, document preservation, interim accounting, expedited discovery and order appointing receiver);
- (19) *SEC v. Brown, et al.*, No. 6:15-cv-119-WSS (W.D. Tex. 2015)(Smith, W.)(granting order freezing assets, requiring accounting, preserving documents and other emergency relief);
- (20) *SEC v. Robert A. Helms, et al.*, No. 1:13-cv-01036-LY (W.D. Tex. 2013)(Yeakel, L.)(granting order freezing assets, requiring an accounting, preservation of documents and other emergency relief; granting order appointing receiver);
- (21) *SEC v. Marco A. Ramirez, et al.*, No. 7:13-cv-531 (S.D. Tex. 2013)(Crane, R.)(granting order freezing assets, appointment of receiver, requiring an accounting, preservation of documents and other emergency relief);
- (22) *SEC v. Kevin G. White, et al.*, No. 4:13-cv-00383-RAS-DDB (E.D. Tex. 2013)(Schell, R.)(granting order freezing assets, requiring an accounting, preservation of documents and other emergency relief; granting order appointing receiver);
- (23) *SEC v. Bergin, et al.*, No. 3:13-cv-01940-M (N.D. Tex. 2013)(Lynn, B.)(granting order freezing assets, requiring preservation of documents and authorizing expedited discovery);
- (24) *SEC v. Investment Intelligence Corporation PTY LLC, et al.*, No. 1:12-cv-00863-LY (W.D. Tex. 2012)(Yeakel, L.)(granting order freezing assets, granting temporary restraining order and other emergency relief);
- (25) *SEC v. Usee, Inc., et al.*, No. 3:12-cv-01325-M (N.D. Tex. 2012)(Lynn, B.)(granting order freezing assets, requiring accounting, requiring preservation of documents and authorizing expedited discovery);
- (26) *SEC v. Evolution Capital Advisors, LLC, et al.*, No. H-11-2945 (S.D. Tex. 2011)(Miller, G.)(granting asset freeze, and appointing receiver);
- (27) *SEC v. Temme, et al.*, No. 4:11-cv-655 (E.D. Tex.)(Schneider, M.)(granting temporary restraining order, expedited discovery and appointing receiver)
- (28) *SEC v. Bjork, et al.*, No. 4:11-cv-02830 (S.D. Tex.)(Ellison, K.)(granting temporary restraining order, order requiring an accounting, expedited discovery, and order appointing receiver);
- (29) *SEC v. Blackwell, et al.*, No. 3:11-cv-234-L (N.D. Tex.)(Lindsay, S.)(granting temporary restraining order);
- (30) *SEC v. Smith, et al.*, No.4:10-cv-613-MHS-ALM (E.D. Tex.)(Snyder, M)(granting temporary restraining order, orders requiring asset freeze, accounting, preservation of documents and expedited discovery);
- (31) *SEC v. Ginder, et al.*, No. 4:10-cv-02867 (S.D. Tex 2010)(Sim, L.)(granting agreed orders appointing receiver and requiring an accounting);

- (32) *SEC v. Petrogas Overseas Trading, LP, et al.*, No. 4:10-cv-395-A (N.D. Tex. 2010)(McBryde, J.)(granting temporary restraining order, orders freezing assets, requiring and accounting of revenues, expenses and assets, requiring an accounting of revenues, expenses and assets, prohibiting the destruction and/or alteration of documents, requiring surrender of passports, requiring repatriation of assets and authorizing expedited discovery);
- (33) *SEC v. American Settlement Associates, LLC, et al.*, No. 4:10-cv-912 (S.D. Tex. 2010)(Lake, S.)(granting order freezing assets and other emergency relief and order appointing receiver);
- (34) *SEC v. Alan Todd May, et al.*, No. 3:10-cv-425-L (N.D. Tex. 2010)(Lindsey, S.)(granting order freezing assets and other emergency relief and order appointing receiver);
- (35) *SEC v. Striker Petroleum, LLC, et al.*, No. 3:09cv2304-D (N.D. Tex. 2009)(Fitzwater, S.)(granting agreed order freezing assets and appointing receiver);
- (36) *SEC v. Harris, et al.*, No. 3:09cv1809-M (N.D. Tex. 2009)(Boyle, J) (granting agreed order freezing assets and appointing receiver);
- (37) *SEC v. Saleh, et al.*, No. 3:09-cv-1778-M, (N.D. Tex. 2009)(Lynn, B.)(granting order freezing assets, requiring an accounting, requiring preservation of documents, and authorizing expedited discovery);
- (38) *SEC v. Poetter, et al.*, No. 6:09-cv-398, (E.D. Tex. 2009)(Schneider, M.)(granting appointment of receiver and expedited discovery);
- (39) *SEC v. Titan Wealth Management, et al.*, No. 4:09-cv-418 (E.D. Tex. 2009)(Schneider, M.)(granting temporary restraining order, freezing assets, requiring an accounting, requiring preservation of documents, authorizing expedited discovery and granting other equitable relief);
- (40) *SEC v. Randall, et al.*, No. 3:09-cv-1465-O (N.D. Tex. 2009)(O'Connor, R.)(granting temporary order, order freezing assets, requiring accounting, requiring preservation of documents, and authorizing expedited discovery and order appointing receiver);
- (41) *SEC v. PrivateFX Global One, Ltd., et al.*, No.H-09-cv-1541, (S.D. Tex. 2009)(Lake, S.)(granting asset freeze and other emergency relief, and appointing receiver);
- (42) *SEC v. Kiselak Capital Group, et al.*, No. 4:09-cv-256-A (N.D. Tex. 2009)(McBryde, J.)(granting temporary restraining order and other emergency relief);
- (43) *SEC v. Ponta Negra Fund I, LLC, et al.*, No. A09CA-324-SS (W.D. Tex. 2009)(Sparks, B.)(granting temporary restraining order, order freezing assets and granting other emergency relief);
- (44) *SEC v. Benny L. Judah and Excel Lease Fund, Inc.*, No. 5:09cv0087-C (N.D. Tex. 2009)(S. Cummings)(granting agreed order freezing assets and appointing receiver);
- (45) *SEC v. Oversea Chinese Fund Limited Partnership, et al.*, No. 3:09-cv0614-B (N.D. Tex. 2009)(Boyle, J.)(granting temporary restraining order, order freezing assets, order requiring an accounting, order requiring preservation of documents, and order authorizing expedited discovery, and order appointing receiver);
- (46) *SEC v. Millennium Bank., et al*, No. 7-09-cv-050-O (N.D. Tex. 2009)(O'Connor, R)(order freezing assets, temporary restraining order, order appointing receiver.);
- (47) *SEC v. Ray M. White., et al*, No. 3-09-cv-0407-K (N.D. Tex. 2009)(Kinkeade, E)(granting order freezing assets, temporary restraining order and order appointing receiver);
- (48) *SEC v. Stanford International Bank, Ltd., et al.*, No. 3:09-cv-0298-N (N.D. Tex. 2009)(Godbey, D)(order ranting temporary restraining order, order freezing assets, order

- requiring an accounting, order requiring preservation of documents, and order authorizing expedited discovery, and order appointing receiver)
- (49) *SEC v. Rod Cameron Stringer, et al*, No. 5:09cv0009-C (N.D. Tex. 2009)(Cummings, S.)(order appointing receiver);
 - (50) *SEC v. Star Exploration, Inc., et al*, No. 3:08-cv-2248-O (N.D. Tex. 2008)(O'Connor, R.)(order appointing receiver);
 - (51) *SEC v. Delta Onshore Management, LLC, et al*, No. 08-1278-MLB (D. Kan. 2008)(Belot, M.)(order freezing assets and order appointing receiver);
 - (52) *SEC v. Patrick Henry Haxton, et al.*, No. 3-08CV1467-L (N.D. Tex. 2008)(Lindsay, J.)(granting asset freeze, temporarily restraining order, requiring accountings; prohibiting document alteration or destruction, authorizing expedited discovery; and authorizing alternative methods of service);
 - (53) *SEC v. W Financial Group, LLC, et al.*, No. 3:08-CV-499-N (N.D. Tex. 2008)(Godbey, D.)(granting temporary restraining order, order freezing assets, requiring preparation of sworn accountings, prohibiting document alteration or destruction, authorizing expedited discovery, repatriating all funds and assets and authorizing alternative methods of service)
 - (54) *SEC v. McNaul, II, et al.*, No.08-1159-JTM (D. Kan. 2008)(Marten, J.)(granting order freezing assets and requiring preservation of documents, and order appointing receiver);
 - (55) *SEC v. T-Bar Resources, LLC, et al.*, No. 3-07-CV-1994 (N.D. Tex. 2007)(Boyle, J.)(granting agreed preliminary injunction and emergency asset freeze, and appointment of receiver);
 - (56) *SEC v. Terax Energy, Inc.*, No. 3-07-CV-1554 (N.D. Tex. 2007)(Lynn, B.) (granting temporary restraining order, order freezing assets, requiring an accounting, requiring preservation of documents, authorizing expedited discovery, and order appointing temporary receiver);
 - (57) *SEC v. Roberts, et al.*, No. 4:07-CV786-JLH (E.D. Ark. 2007)(Holmes, J.)(granting agreed order of preliminary injunction, order freezing assets, requiring an accounting, and requiring preservation of documents);
 - (58) *SEC v. AmeriFirst Funding, et al.*, No. 3-07-CV-1188 (N.D. Tex. 2007)(Fitzwater, S.)(granting temporary restraining order, order freezing assets, requiring an account, requiring preservation of documents, requiring repatriation of assets and authorizing expedited discovery, and order appointing temporary receiver);
 - (59) *SEC v. Longs, et al.*, No. 4-07-cv-537-SWW (E.D. Ark. 2007)(Wrights, S.)(agreed order of preliminary injunction, order freezing assets, requiring an accounting, requiring repatriation of assets, and requiring preservation of documents);
 - (60) *SEC v. One or More Unknown Purchasers of Call Options for the Common Stock of TXU Corp, et al.*, No. 01-07-CV-1208 (N.D. Tex. 2007)(Lindberg, G.) (granting temporary restraining order and order freezing assets);
 - (61) *SEC v. ABC Viaticals, et al.*, No. 3-06-CV-2136-P (N.D. Tex. 2006) (Solis, J.)(granting temporary restraining order and order appointing receiver);
 - (62) *SEC v. Seaforth Meridian, LTD., et al.* (No. 06-4107-RDR)(D. Kan. 2006)(granting ex parte order freezing assets, requiring repatriation of assets, authorizing expedited discovery, order requiring preservation of documents and order appointing receiver);
 - (63) *SEC v. Integrated Equities, Inc., et al.*, No. 2:06-CV-00779-RCJ-GWF (D. Nev. 2006)(Jones, R.)(granting preliminary injunctions and order appointing temporary receiver);

- (64) *SEC v. Sunray Oil Company, Inc., et al.*, No. 3:06-CV-1097-R (N.D. Tex. 2006)(Buchmeyer, J.)(granting temporary restraining order, order freezing assets, and order appointing temporary receiver);
- (65) *SEC v. EFS, LLC, et al.*, No. 3-06CV0793-M (N.D. Tex. 2006)(Sanders, B.)(granting ex parte temporary restraining order and order freezing assets and order appointing temporary receiver);
- (66) *SEC v. ATM Alliance Corp. et al.*, No. A-05-CA-190-LY (W.D. Tex. 2005)(granting ex parte temporary restraining order; order freezing assets; and order appointing temporary receiver);
- (67) *SEC v. Travis Correll, et al.*, No. 4:05-CV-472 (E.D. Tex. 2005)(Schell, R.)(granting ex parte temporary restraining order, order freezing assets and order appointing temporary receiver);
- (68) *SEC v. Allixon International Corp., et al.*, No. 3:05-CV-2260-P (N.D. Tex. 2005)(Godbey, D.)(granting temporary order freezing assets);
- (69) *SEC v. Nelson, et al.*, No. 5:05-CV-0266-C (N.D. Tex. 2005)(Cummings, S.)(granting ex parte order freezing asset and order appointing temporary receiver);
- (70) *SEC v. Megafund, Inc.*, No. 3:05-CV-1328-L (N.D. Tex. 2005)(Lindsey, J.)(granting ex parte temporary restraining order, order freezing assets and order appointing receiver)
- (71) *SEC v. David Tanner*, No. 05-4057-SAC (D. Kan. 2005)(Crow, J.)(granting ex parte temporary restraining order and asset freeze order)
- (72) *SEC v. Philip D. Phillip*, No. 2-05CV-107-J (N.D. Tex. 2005)(Robinson, J.)(granting temporary restraining order and order freezing assets);
- (73) *SEC v. Jack A. Brown*, No. 6:04-CV-537 (E.D. Tex. 2004)(Schneider, J.)(granting ex parte asset freeze order and order appointing receiver)
- (74) *SEC v. Kaye*, No. 04-1275-MLB (D. Kan. 2004) (Belot, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (75) *SEC v. Kings Real Estate Inv. Trust*, No. 5:04-04006-RDR-KGS (D. Kan. 2004) (Rogers, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (76) *SEC v. Cash Link Systems Inc.*, No. 3-04-CV-1573-L (N.D. Tex. 2004) (Lindsay, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (77) *SEC v. Levy*, No. 304-CV- 00351-N (N.D. Tex. 2004) (Godbey, J.) (granting an order freezing assets)
- (78) *SEC v. Montana*, No. CIV-04-542 (S.D. Tex. 2004) (Kent, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (79) *SEC v. Holt*, No. No. CIV-03-1825 (D. Ariz. 2003) (Rosenblatt, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (80) *SEC v. Henderson*, No. 3-03-CV-2661-K (N.D. Tex. 2003) (Kinkeade, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (81) *SEC v. IPIC Int'l, Inc.*, No. 3-03-CV-2781-P (N.D. Tex. 2003) (Solis, J.) (granting an ex parte temporary restraining order, an freezing assets, and an order appointing a temporary receiver)

- (82) *SEC v. Rocky Mountain Energy Corp.*, No. H-03-1133 (S.D. 2003) (Lake, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (83) *SEC v. United States Reservation Bank and Trust*, No. CIV-02-0581 (D. Ariz. 2002) (Carroll, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (84) *SEC v. Southmark Advisory, Inc.*, No. 02CV-830E-(M) (N.D. Okla. 2002) (Ellison, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (85) *SEC v. Tyler*, No. 3-02-CV-0282-P (N.D. Tex. 2002) (Solis, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (86) *SEC v. Res. Dev. Int'l, L.L.C.*, No. 3-02-CV-0605-H (N.D. Tex. 2002) (Buchmeyer, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (87) *SEC v. Dillie*, No. CIV-01-2493 (D. Ariz. 2001) (Teilborg, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (88) *SEC v. Stroud*, No. CIV-01-999-L (W.D. Okla. 2001) (West, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (89) *SEC v. English*, No. CIV-01-223-W (W.D. Okla. 2001) (West, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (90) *SEC v. Hill*, No. 3-01-CV-2189-X (N.D. Tex. 2001) (Fitzwater, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (91) *SEC v. C-Tech, L.L.P.*, No. 3-01-CV-2542-P (N.D. Tex. 2001) (Solis, J.) (granting an order freezing assets and an order appointing a receiver)
- (92) *SEC v. First Americap Corp.*, No. H-01-1153 (S.D. Tex. 2001) (Buchmeyer, J.) (granting an ex parte temporary restraining order and an order freezing assets)
- (93) *SEC v. Perennial Fund I LP*, No. C00-21181 (N.D. Cal. 2000) (Ware, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (94) *SEC v. Broadband Wireless Int'l Corp.*, No. CIV-00-1375 (W.D. Okla. 2000) (Russell, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (95) *SEC v. Garland*, No. 3-00-CV-1149-X (N.D. Tex. 2000) (Kendall, J.) (granting a temporary restraining order, and an order freezing assets)
- (96) *SEC v. New World Web Vision.Com, Inc.*, No. 4-00-CV-0231-Y (N.D. Tex. 2000) (Means, J.) (granting a temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (97) *SEC v. Stadtt Media, L.L.C.*, No. 3-00-CV-1489-P (N.D. Tex. 2000) (granting a temporary restraining order, an asset freeze order, and an order appointing receiver *pendente lite*)
- (98) *SEC v. Ellis*, No. 3-00-CV-1040-P (N.D. Tex. 2000) (Solis, J.) (granting an ex parte temporary restraining order and an order freezing assets)
- (99) *SEC v. Le Club Prive, S.A.*, No. 3-00-CV-1851-R (N.D. Tex. 2000) (Buchmeyer, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)

- (100) *SEC v. Houston Texans NFL Football Team Holding Co.*, No. H-00-3072 (S.D. Tex. 2000) (Rainey, J.) (granting an ex parte temporary restraining order and an order freezing assets)
- (101) *SEC v. Oracle Trust Fund*, No. 99-1483-MLB (D. Kan. 1999) (Belot, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver *pendente lite*)
- (102) *SEC v. Cornerstone Prodigy Group, Inc.*, No. 4-99-CV-0978-Y (N.D. Tex. 1999) (Means, J.) (granting an order freezing assets and an order appointing a receiver)
- (103) *SEC v. Highland Financial Corp.*, No. 4-99-CV-0719-D (N.D. Tex. 1999) (granting an ex parte restraining order, an order freezing assets, and an order appointing a receiver *pendente lite*)
- (104) *SEC v. Brooks*, No. 3-99-CV-1326-D (N.D. Tex. 1999) (Fitzwater, J.) (granting an ex parte temporary restraining order and an order freezing assets)
- (105) *SEC v. Redbank Petroleum, Inc.*, No. 3-99-CV-1267-T (N.D. Tex. 1999) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver *pendente lite*)
- (106) *SEC v. Cook*, No. 3-99-CV-051-X (N.D. Tex. 1999) (Buchmeyer, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver)
- (107) *SEC v. Inverworld, Inc.*, No. SA-99-CA-0822-FB (W.D. Tex. 1999) (Biery, J.) (granting an order freezing assets and an order appointing a receiver *pendente lite*)
- (108) *SEC v. Great White Marine and Recreation, Inc.*, No. W-99-CA-230 (W.D. Tex. 1999) (Smith, J.) (granting a temporary restraining order and an order appointing an agent, but refusing to grant an asset freeze order against relief-defendant)
- (109) *SEC v. Sunpoint Securities, Inc.*, No. 6-99-CV-667 (E.D. Tex. 1999) (Hannah, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver)
- (110) *SEC v. American Automation, Inc.*, No. 3-98-CV-1596-D (N.D. Tex. 1998) (Fitzwater, J.) (granting an ex parte temporary restraining order and an order freezing assets).
- (111) *SEC v. Trinity Gas, Corp., et al.*, No. 4-97-cv001018 (N.D. Tex. 1997) (Means, J.) (granting temporary restraining order, order freezing assets, order for accounting, order prohibiting destruction, order granting expedited discovery, order setting hearing date for preliminary hearing and appointing receiver).